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Filed Electronically

Clerk of the Court
Second Circuit Court of Appeals
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: Appeal of Jeffrey M. Brown
Case No. 14-542

Dear Clerk of the Court:

In regards to the substitution of counsel filed on today's date, Mr. Forrest S. Turkish, counsel of record in the New York Southern District Court matter, is fully aware and consents to the full substitution of Joseph Darrell Palmer as counsel in the Second Circuit Appellate Court matter.

Please do not hesitate to call or email should you have any questions or concerns regarding this matter.

Sincerely,

/s/ Joseph Darrell Palmer
Joseph Darrell Palmer

DP/mvc
cc: Forrest S. Turkish